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Counsel for Defendants, Bank of America, N.A., for itself and as successor by merger to BAC Home Loans Servicing, LP, Mortgage Electronic Registration Systems, Inc. and ReconTrust Company, N.A.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DAVID P. GRAHAM,

Plaintiff,

vs.

BANK OF AMERICA, N.A.; BAC HOME  
LOANS SERVICING, LP; MORTGAGE  
ELECTRONIC REGISTRATION SYSTEMS,  
INC.; RECONTRUST COMPANY, N.A.,

Defendants.

Case No. 4:12-cv-00736-DMR

**STIPULATION FOR 90 DAY STAY AND  
[PROPOSED] ORDER AS MODIFIED**

Subject to the approval of this Court, Plaintiff David P. Graham (“Plaintiff”) and Defendants, Bank of America, N.A., for itself and as successor by merger to BAC Home Loans Servicing, LP, Mortgage Electronic Registration Systems, Inc. and ReconTrust Company, N.A (collectively, “Defendants”) hereby submit this Stipulation (the “Stipulation”) regarding the above-captioned matter.

**RECITALS**

1. Plaintiff filed a lawsuit against Defendants in the above-captioned Court on or about February 15, 2012;

2. Plaintiff and Defendants have agreed that the above-captioned matter will be stayed

1 for 90 days from the date of the Court's order approving this stipulation ("the Stay Expiration  
2 Date"). The purpose of this stay is to allow the parties to facilitate investigation of the alleged  
3 claims, to explore the possibility of entering into a settlement before expending time, avoid  
4 expenses and judicial resources in connection with the present litigation, and to allow sufficient  
5 time for the settlement process to be conducted prior to the onset of litigation;

6 3. Any outstanding responses, including a response to the complaint, motions,  
7 hearings, or other litigation will be stayed until the Stay Expiration Date; and

8 4. For purposes of filing a responsive pleading, Defendants will be deemed served on  
9 the Stay Expiration Date. If settlement negotiations are not concluded within 90 days,  
10 Defendants' time to plead will be deemed extended until 30 days after the Stay Expiration Date.

11 IT IS SO STIPULATED.  
12

13 Dated: April 12, 2012

By: /s/ Sabina A. Helton

Sabina A. Helton  
Attorneys for Defendants

15 Dated: April 12, 2012

16 By: Michael  
Yesk

Michael Yesk  
Attorney for Plaintiff

Digitally signed by Michael Yesk  
DN: cn=Michael Yesk, c=US,  
o=Yesk Law,  
email=yesklaw@gmail.com  
Date: 2012.04.12 07:18:53  
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**ORDER**

1. The above-captioned matter is stayed for 90 days from the date of this Order ("the Stay Expiration Date"). The purpose of this stay is to allow the parties to facilitate investigation of the alleged claims, to explore the possibility of entering into a settlement before expending time, expense and judicial resources in connection with the present litigation, and to allow sufficient time for the settlement negotiations to be conducted prior to the onset of litigation; and

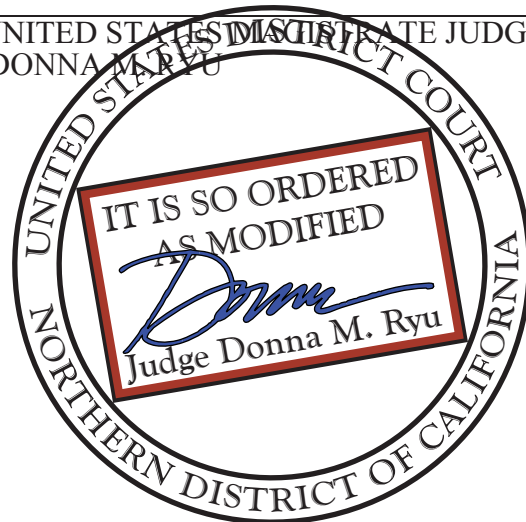
2. For purposes of filing a responsive pleading, Defendants will be deemed served on the Stay Expiration Date. If settlement negotiations are not concluded within 90 days, Defendants' time to plead will be deemed extended until 30 days after the Stay Expiration date.

IT IS HEREBY ORDERED THAT the above-captioned matter be stayed for 90 days from the date of this Order.

IT IS SO ORDERED AS MODIFIED BY THE COURT.

DATE: April 25, 2012

UNITED STATES DISTRICT JUDGE  
DONNA M. RYU



**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2012, I electronically filed the foregoing **STIPULATION FOR 90 DAY STAY AND [PROPOSED] ORDER** with the Clerk of the Court using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

By: /s/ Sabina A. Helton